

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MALIBU MEDIA, LLC, :
Plaintiff, : Case No. 1:14-cv-10155-KBF
vs. : Judge Forrest
Defendant. :
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DECLARATION OF JACQUELINE M. JAMES, ESQ.

I, Jacqueline M. James, of full age, do hereby declare under penalty of perjury as follows:

1. I am attorney with The James Law Firm, PLLC, and I am an attorney at-law-of the state of New York and admitted before this Court. I am counsel of record for Plaintiff in the above-captioned matter. I make this declaration in support of Plaintiff's accompanying Motion for Sanctions.

2. Attached hereto as Exhibit A is a true and correct redacted copy of Patrick Paige's Expert Report.

3. Attached hereto as Exhibit B is a true and correct redacted copy of Defendant's deposition.

4. Attached hereto as Exhibit C is a true and correct redacted copy of Defendant's Response to Plaintiff's First Set of Interrogatories.

5. Attached hereto as Exhibit D is a true and correct redacted copy of Defendant's Response to Plaintiff's First Set of Interrogatories.

Dated: September 22, 2015

Respectfully submitted,

By: /s/ Jacqueline M. James
Jacqueline M. James, Esq. (1845)
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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2015 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Jacqueline M. James